

EHS CONCEPTS — THE WAYS OF SAFETY

OSHA'S TOP 10. FIXED AT THE SYSTEM.

A field guide to the 10 most frequently cited OSHA standards, and the leadership systems that keep them off your citation list.

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Inside: the verified FY 2026 list with citation counts · the paragraphs OSHA actually cites · why companies really get cited · a printable 30-minute self-audit for each standard · controls, owners, field verification, and a toolbox talk starter for all ten.



EHS CONCEPTS
— THE WAYS OF SAFETY —

FREE FIELD GUIDE

FROM RYAN

SIXTEEN YEARS IS NOT A TRAINING PROBLEM

Every fall, OSHA tells us exactly where it keeps finding the same problems. Every fall, a lot of us share the list, nod, and go back to work. Then the same ten standards show up again the next year.

Fall Protection has been number one for sixteen straight years. Read that again. Sixteen years. That is not a training problem. Nobody has gone sixteen years without hearing that people fall off roofs. It is a system problem. The plan said one thing, the job did another, and nobody with the authority to close that gap was standing there when it opened.

OSHA's own presenter said it plainly this year: "Fall protection violations are often a failure to manage the job." I agree. Most of what gets cited on this list is not a worker who woke up careless. It is a schedule that left no time to set the guardrail, a written program nobody has opened since the consultant left, a forklift operator certified three sites ago, a guard that came off for a jam and never went back on because production was behind.

So this guide does not stop at what the standard says. For each of the ten it gives you the paragraphs OSHA actually writes up, the leadership and system failures that put them there, a 30-minute self-audit you can run this week, the controls in the order that works, who owns each piece, how to prove it is working on the floor, and one question to open a toolbox talk.

Two ideas run through every page. First, leaders own the conditions. Workers own their choices inside the conditions we build for them. Second, if your safety system depends on courage, you don't have one. If the only thing between a worker and a fall is that worker being brave enough to tell a foreman no, you have a hope, not a system. Stop is a right on this site. Restart is a decision. Build it so nobody has to be a hero to go home.

Use this guide on the floor, not in the binder. Pick one standard. Run the checklist. Fix what you find. Then come back for the next one.

RYAN L. RINEHART

Founder, EHS Concepts — The Ways of Safety

Keep your people whole.

THE VERIFIED LIST

OSHA'S TOP 10 MOST FREQUENTLY CITED STANDARDS, FY 2026

	STANDARD	CITATION	SCOPE	FY 2026 PRELIM.	FY 2025 FINAL (RANK)
1	Fall Protection – General Requirements	29 CFR 1926.501	CON	4,041	6,992 (#1)
2	Hazard Communication	29 CFR 1910.1200	BOTH	1,961	3,010 (#2)
3	Lockout/Tagout	29 CFR 1910.147	GI	1,863	2,562 (#4)
4	Scaffolding	29 CFR 1926.451	CON	1,725	2,286 (#6)
5	Ladders	29 CFR 1926.1053	CON	1,659	2,842 (#3)
6	Respiratory Protection	29 CFR 1910.134	BOTH	1,608	2,294 (#5)
7	Powered Industrial Trucks	29 CFR 1910.178	GI	1,379	2,150 (#8)
8	Fall Protection – Training Requirements	29 CFR 1926.503	CON	1,273	2,216 (#7)
9	Eye and Face Protection	29 CFR 1926.102	CON	1,120	1,965 (#9)
10	Machine Guarding	29 CFR 1910.212	GI	1,072	1,498 (#10)

List: preliminary (Oct 1, 2025 to Aug 31, 2026 data). Scope tags: GI = general industry (29 CFR 1910), CON = construction (29 CFR 1926), BOTH = cited in both. Hazard Communication and Respiratory Protection are 1910 standards that also apply in construction through 29 CFR 1926.59 and 1926.103.

What a citation costs (2026, final). Federal OSHA maximum penalties: \$16,550 per serious or other-than-serious violation; \$165,514 per willful or repeated violation; \$16,550 per day for failure to abate. OSHA left the amounts unchanged for 2026. <https://www.osha.gov/memos/2026-05-21/2026-annual-adjustments-osh-civil-penalties>

Preliminary federal OSHA data, Oct. 1, 2025 through Aug. 31, 2026, presented by Prent Cline, acting deputy director of OSHA's Directorate of Enforcement Programs, at the 2026 NSC Safety Congress & Expo (Indianapolis, Sept. 15, 2026). State-plan OSHA citations are not included. FY 2025 final counts (Oct. 1, 2024 through Sept. 30, 2025, data pulled April 15, 2026) are shown for context. The FY 2026 numbers cover 11 months and are preliminary, so they will rise when OSHA finalizes them. Do not read the lower FY 2026 totals as a trend. Last year the preliminary Fall Protection count was 5,914 and the final was 6,992.

Sources: OSHA presentation slides as published by Safety+Health magazine; National Safety Council; Safety+Health; OSHA ([osha.gov/top10citedstandards](https://www.osha.gov/top10citedstandards)). Full links on the Sources page. Some NSC and S+H web copy lists Hazard Communication as "1926.1200." OSHA's slide lists 1910.1200, which is correct.

OSHA, in its own words. "Fall protection violations are often a failure to manage the job." — Prent Cline, OSHA Directorate of Enforcement Programs, 2026 NSC Safety Congress & Expo (via Safety+Health)

READ THE LIST LIKE A LEADER

THE PATTERN BEHIND THE NUMBERS

The citations have a body count. The National Safety Council matched OSHA's FY 2025 Top 10 to federal injury data. Falls to a lower level, behind four of the ten (fall protection, ladders, fall protection training, scaffolds), killed 725 workers in 2023. Hazardous energy, behind lockout/tagout, killed 48 workers in 2023. Being caught in running equipment, behind machine guarding, killed 53 workers in 2023 (NSC, using BLS data, September 2025).

Four of the ten are about falls. Fall Protection, Scaffolding, Ladders, and Fall Protection Training account for 8,698 of the 17,701 Top 10 violations in the FY 2026 preliminary data, about 49 percent. Gravity is still the energy we manage worst.

A lot of the list is paper that does not match the job. In FY 2025 the single most-cited HazCom paragraph was the written program. In LOTO it was the energy control procedure. In Respiratory Protection it was the medical evaluation. For forklifts and fall protection training, certification records sit near the top. Either the program does not exist, or it exists and the job is not running on it.

Training shows up everywhere. HazCom, LOTO, Respiratory Protection, Forklifts, and Fall Protection Training all have training paragraphs in their most-cited lists. Training that is not verified at the job is attendance, not competence.

Inspections that do not happen. Periodic LOTO inspections, daily forklift checks, pre-shift scaffold inspections, and ladder inspections are routine citations. If nobody owns the inspection by name and date, it will not happen on a busy week.

The list is construction heavy. The failures are universal. Six of the ten are construction standards. The failures behind them, unclear ownership, schedule pressure, paper programs, and no real authority to stop, look the same in a hospital, a warehouse, a plant, or a substation.

If your safety system depends on courage, you don't have one. Every section in this guide asks the same question: does the control exist on the job without anyone having to be brave? If a worker has to argue with a schedule to get a guardrail, the system is the schedule.

How to use this guide

1. Start with the standard that matches your worst exposure, not the one at the top of the list.
2. Print the checklist page. Walk one job, one area, or one crew. Thirty minutes, no more.
3. Score what you can put your hand on, not what the binder claims. If the file and the job disagree, the file is wrong until the job changes.
4. Every "No" gets an owner and a due date before you leave the area. Use the gap response in each section.
5. Repeat in 30 days. A fix that is not verified is a wish.

USE THIS EVERY TIME

WHEN YOU FIND A GAP: THE EIGHT-STEP RESPONSE

1. Stop or contain.	If the gap is a live exposure (an unprotected edge, an unguarded point of operation, an untrained operator on a truck), stop that task now. Anyone can call it. Restart is a separate decision by a named person after the control is in place.
2. Fix the energy before the paper.	Put the guardrail up, the guard back on, the lock on the disconnect. Then update the document to say what is true.
3. Find the decision that allowed it.	Ask what made the gap normal: schedule, staffing, missing equipment, unclear ownership, a reward that pointed the wrong way. Do not stop at "the worker didn't follow the rule."
4. Assign one owner and one date.	One name, not a department. One date, not "ASAP."
5. Verify in the field.	The owner shows the fix on the job, not in an email. Re-check in 30 days.
6. Look sideways.	If it happened on one crew, one line, or one site, check the others this week.
7. Protect the person who raised it.	Thank them. Tell them what changed. Watch the next 30 days. Retaliation for reporting a hazard or injury is illegal under Section 11(c) of the OSH Act and 29 CFR 1904.35(b)(1)(iv).
8. Get help when you need it.	Small and midsize employers can use OSHA's free, confidential On-Site Consultation Program (osha.gov/consultation), which is separate from enforcement.

Leaders own the conditions. Workers make choices inside the conditions we build. When a gap shows up, the first question is not "who did it?" It is "what did we build, fund, schedule, or tolerate that made this normal?"

This guide is a practical summary for planning and self-audit. It is not legal advice and does not replace the text of the standards, OSHA interpretations, or your state plan's rules. State-plan states may have different or additional requirements. Paragraph descriptions are paraphrased. When this guide and a regulation disagree, the regulation controls.

01

FALL PROTECTION – GENERAL REQUIREMENTS

29 CFR 1926.501 · CON

4,041 violations, FY 2026 preliminary · 6,992 FY 2025 final (No. 1)

THE PAIN POINT Your crew is working 6 feet or higher today. Is there something between them and the ground other than their own balance?

What it requires, in plain words

In construction, any worker on a walking or working surface with an unprotected side or edge 6 feet or more above a lower level must be protected by a guardrail system, a safety net system, or a personal fall arrest system. The standard spells out where protection is required: leading edges, holes, roofs, ramps, excavation edges, wall openings, hoist areas, and more. It also covers falling objects. How each system must be built is in 1926.502.

Residential construction has its own paragraph, (b)(13). A written fall protection plan under 1926.502(k) is allowed only when the employer can show conventional protection is infeasible or creates a greater hazard.

The paragraphs OSHA actually cites FY 2025 data*

PARAGRAPH	WHAT WAS MISSING	CITES
1926.501(b)(13)	Residential construction at 6 ft or more without guardrails, nets, or personal fall arrest	4,446
1926.501(b)(1)	Unprotected sides and edges 6 ft or more above a lower level	563
1926.501(b)(10)	Low-slope roofing without an allowed system or combination	358
1926.501(b)(11)	Steep roofs without guardrails with toeboards, nets, or personal fall arrest	257
1926.501(b)(4)	Holes (including skylights)	135

*Top 5 paragraphs, OSHA data Oct. 1, 2024 to Aug. 12, 2025, via Safety+Health. Descriptions paraphrased. FY 2026 paragraph data not yet released.

What OSHA saw this year. In FY 2026 OSHA found workers without fall protection in residential construction, plus unprotected sides, edges, and holes. Cline: "Fall protection violations are often a failure to manage the job." Roofing, framing, and siding contractors topped the FY 2025 industry list.

ROOT CAUSES AND CONTROLS · 29 CFR 1926.501

Why companies really get cited

Not “worker carelessness.” These are the system and leadership failures that make the citation predictable.

- The job was bid and scheduled without the time, equipment, or labor to set protection. Fall protection became something the crew was expected to “find time for.”
- Anchors, guardrail stock, and harnesses were not on the truck. When protection takes a trip back to the shop, it loses to the schedule.
- Nobody was named competent person for that roof that day, or the person named had no authority to stop the work.
- Subcontractor crews were assumed to be covered by their own employer. On multi-employer sites, the controlling employer can be cited too.
- Short tasks (“it’s only five minutes”) were treated as exempt. The standard has no five-minute exception.
- The worker who refused to go up unprotected was the one who got the talk afterward. Everyone else learned the lesson.

Controls, in hierarchy order

Eliminate	Design it out. Prefabricate and assemble at ground level. Parapets or permanent guardrails designed in at the drawing stage.
Engineer: passive	Guardrails, covers, safety nets, aerial lifts or scaffolds instead of working at the edge. Passive systems protect without anyone clipping in.
Engineer: active	Restraint first (cannot reach the edge), then fall arrest with rated anchors, enough clearance, and a rescue plan.
Administrative	Pre-task plan for every elevated task. Bids and schedules that include setup time. Competent person named. Stop-work authority said out loud at the start of the shift. Warning lines and safety monitors only where the standard allows them.
PPE	Harness, lanyard or SRL, inspected and fitted. PPE is the last layer, not the plan.

Systems over blame. If the control only works when a worker is willing to argue with the schedule, it is not a control. Build the condition so the safe way is the normal way, and so stopping the job costs nobody anything.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

01 · FALL PROTECTION - GENERAL REQUIREMENTS

29 CFR 1926.501

SITE	AREA / JOB / CREW	AUDITOR	DATE / SHIFT
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Every surface 6 ft+ (4 ft in general industry) has guardrails, nets, covers, or PFAS in use right now	☐	☐	☐	
2	Holes and skylights are covered, secured, and marked "HOLE" or "COVER" (or guarded)	☐	☐	☐	
3	Guardrails intact: top rail about 42 in., midrail, no gaps at ladder or hoist openings	☐	☐	☐	
4	PFAS anchors are rated or designed by a qualified person, not a vent pipe or a truss tie	☐	☐	☐	
5	Harnesses and lanyards inspected, sized, and actually connected (not just worn)	☐	☐	☐	
6	A rescue plan exists for a suspended worker, and the crew can describe it	☐	☐	☐	
7	Fall protection equipment was on site before the work started	☐	☐	☐	
8	A competent person is named for this job today and can say who can stop the work	☐	☐	☐	
9	Any written fall protection plan (1926.502(k)) is site specific and followed	☐	☐	☐	
10	Subcontractor crews are protected to the same standard	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any "No" that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision, made by a named person after the control is in place.

PREVENTION PLAYBOOK · 29 CFR 1926.501

Who owns it

Owner / executive	Bids and schedules that fund fall protection. Zero tolerance applied to schedules, not just workers.
PM / superintendent	Equipment on site before work starts. Subcontractor prequalification and oversight.
Foreman / competent person	Daily setup and inspection. Stops the work when protection is missing.
Safety lead	Audits, rescue planning, coaching. Advises; does not own the line.
Every worker	Inspects their own gear. Has the right, and the expectation, to stop.

How to verify it is working in the field

- Walk every elevated area unannounced once a week. Count protected vs. unprotected exposures. Track the ratio, not how many reminders were given.
- Ask a worker on the roof: “If you fell right now, how would we get you down?” They should be able to answer.
- Check the job kit list against what is actually on the truck.
- Ask who stopped work last month and what happened to them. If nobody has, find out why.

TOOLBOX TALK STARTER

“Where on this job today could someone fall 6 feet or more, and what is between them and the ground besides their balance?”

Industry notes

Construction	Trigger height is 6 ft (1926.501). Scaffolds are 10 ft (1926.451). Steel erection has its own rules (Subpart R).
General industry, warehousing, manufacturing	Trigger is 4 ft under 1910.28(b)(1). Dock edges, mezzanines, rack tops, and roof access for HVAC work are common gaps.
Utilities	Poles, towers, and bucket trucks also fall under 1910.269(g) and 1926 Subpart V. Aerial lift fall protection is required.
Healthcare and facilities	Roof access for maintenance, mechanical mezzanines, and contractor oversight. Contractors on your roof are working in your conditions.

IF YOU FIND A GAP

Stop elevated work at that location until protection is in place. Then ask why protection was not there before the work began: equipment, bid, schedule, or supervision. Fix that, not just the edge. Then run the eight-step gap response on page 5.

02

HAZARD COMMUNICATION

29 CFR 1910.1200 · BOTH

1,961 violations, FY 2026 preliminary · 3,010 FY 2025 final (No. 2)

THE PAIN POINT Pick any spray bottle on your site. Could the person using it tell you what it can do to them and where its safety data sheet is?

What it requires, in plain words

If workers can be exposed to hazardous chemicals, the employer must have a written hazard communication program, keep a safety data sheet (SDS) for every hazardous chemical, keep containers labeled, and train workers on the hazards in their work area before exposure and whenever a new hazard is introduced. Construction employers are covered through 29 CFR 1926.59, which points to 1910.1200.

OSHA updated the standard in 2024. Employers must update workplace labels, the written program, and training as needed by Nov. 20, 2026 for substances and May 19, 2028 for mixtures (dates final (extended), per OSHA notice of Jan. 15, 2026). Until then the 2012 version, the 2024 version, or both may be followed.

The paragraphs OSHA actually cites FY 2025 data*

PARAGRAPH	WHAT WAS MISSING	CITES
1910.1200(e)(1)	No written program, or one that does not cover labels, SDSs, and training	895
1910.1200(h)(1)	No effective information and training at initial assignment or when a new hazard arrives	646
1910.1200(g)(8)	SDSs not maintained or not readily accessible on each shift	309
1910.1200(f)(6)	Workplace containers not labeled, tagged, or marked	236
1910.1200(g)(1)	No SDS in the workplace for a hazardous chemical in use	185

*Top 5 paragraphs, OSHA data Oct. 1, 2024 to Aug. 12, 2025, via Safety+Health. Descriptions paraphrased. FY 2026 paragraph data not yet released.

What OSHA saw this year. FY 2026 problems included having no hazard communication program at all, inadequate training, and SDS failures. Cline said obtaining SDSs and training employees must become part of routine management practice. FY 2025 industries included roofing, cut stone, masonry, machine shops, and hotels.

ROOT CAUSES AND CONTROLS · 29 CFR 1910.1200

Why companies really get cited

Not “worker carelessness.” These are the system and leadership failures that make the citation predictable.

- Purchasing can bring a new chemical in the door without anyone in safety knowing. There is no gate.
- The written program is a template with another company's name barely removed. Nobody has read it since it was printed.
- Training was a one-time video at hire. Nobody updated it when the product list changed.
- Secondary containers (spray bottles, pump cans, buckets) get filled on the floor and nobody owns labeling them.
- The SDS binder or app works in the office but not in the field, the truck, or on night shift.

Controls, in hierarchy order

Eliminate	Remove chemicals nobody uses. Most sites carry products with no current task.
Substitute	Choose lower-hazard products at the approval gate (water-based, lower VOC, no carcinogens).
Engineer	Ventilation, closed transfer systems, dispensing stations that label as they fill.
Administrative	Chemical approval gate in purchasing, current inventory, SDS access on every shift (digital with paper backup), task-based training at the point of use, a labeling standard for secondary containers.
PPE	Gloves, eye and face protection, and respirators chosen from the SDS, not habit.

Systems over blame. If the control only works when a worker is willing to argue with the schedule, it is not a control. Build the condition so the safe way is the normal way, and so stopping the job costs nobody anything.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

02 · HAZARD COMMUNICATION

29 CFR 1910.1200

SITE	AREA / JOB / CREW	AUDITOR	DATE / SHIFT
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	A written HazCom program exists, names who maintains it, and matches this site	☐	☐	☐	
2	The chemical inventory was updated in the last 12 months and matches the shelves	☐	☐	☐	
3	Pick 5 products at random: each has an SDS workers on this shift can reach in under 5 minutes	☐	☐	☐	
4	Every secondary container is labeled with product identity and hazards (or an allowed alternative)	☐	☐	☐	
5	Ask 2 workers: name one hazard of a chemical you use, and where is its SDS?	☐	☐	☐	
6	Training records show HazCom training at assignment and when new chemicals were added	☐	☐	☐	
7	A purchasing or approval step exists for new chemicals before they arrive	☐	☐	☐	
8	Contractors were told about chemical hazards on site, and told you about theirs	☐	☐	☐	
9	A plan is in place for the 2024 HCS update (labels, program, training by Nov. 20, 2026 for substances)	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any "No" that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision, made by a named person after the control is in place.

Who owns it

Executive	Requires a chemical approval step in purchasing. Funds the SDS system.
Purchasing	No new chemical without an SDS and approval.
Supervisor	Labels and SDS access in their area. Task training before first use.
Safety lead	Program, inventory, training content, HCS 2024 update.
Workers	Label what they fill. Ask before using an unfamiliar product.

How to verify it is working in the field

- Run the “5 products, 5 minutes” SDS test on every shift, including nights, each quarter.
- Compare purchase records to the chemical inventory. Anything bought but not listed is a hole in the gate.
- Ask workers to explain a pictogram on a product they used today.

TOOLBOX TALK STARTER

“What is the most dangerous chemical in this area, and what would you do in the first 60 seconds if it got on your skin or in your eyes?”

Industry notes

Construction	Covered through 1926.59. Silica-containing materials, solvents, cement, and roofing products. On multi-employer sites, contractors must share hazard information.
Healthcare	Disinfectants, sterilants, and hazardous drugs. NIOSH publishes additional guidance on hazardous drug handling.
Hospitality and janitorial	Hotels appeared in the FY 2025 HazCom industry list. Cleaning chemicals and secondary containers are the usual gap.
Manufacturing and machine shops	Metalworking fluids, coatings, and process chemicals. A process change is the moment training goes stale.

IF YOU FIND A GAP

Pull any unlabeled or unidentified container from use until it is identified and labeled. Get the SDS. Then fix the gate that let it in, whether that is purchasing, a contractor, or a refill station. Then run the eight-step gap response on page 5.

03

CONTROL OF HAZARDOUS ENERGY
(LOCKOUT/TAGOUT)

29 CFR 1910.147 · GI

1,863 violations, FY 2026 preliminary · 2,562 FY 2025 final (No. 4)

THE PAIN POINT When the line jams at 2 a.m., what actually happens before someone reaches in?

What it requires, in plain words

Before anyone services or maintains a machine where unexpected startup or release of stored energy could hurt them, the machine must be isolated from every energy source and made inoperative. The employer must have an energy control program with written, machine-specific procedures, training for authorized and affected employees, and a periodic inspection of each procedure at least once a year.

Normal production work is covered only when a guard is removed or bypassed, or a body part enters the point of operation or danger zone. The minor servicing exception applies only when alternative measures give effective protection.

The paragraphs OSHA actually cites FY 2025 data*

PARAGRAPH	WHAT WAS MISSING	CITES
1910.147(c)(4)	Energy control procedures missing, not machine specific, or incomplete	675
1910.147(c)(7)	Training and communication for authorized, affected, and other employees	422
1910.147(c)(6)	Periodic inspection of procedures not done or not certified	345
1910.147(c)(1)	No energy control program (procedures, training, periodic inspections)	208
1910.147(d)	Lockout steps not applied in the required sequence	152

*Top 5 paragraphs, OSHA data Oct. 1, 2024 to Aug. 12, 2025, via Safety+Health. Descriptions paraphrased. FY 2026 paragraph data not yet released.

What OSHA saw this year. In FY 2026 some employers had no procedures. Others had procedures workers were no longer following. OSHA also found missing periodic inspections and inadequate training for authorized employees. FY 2025 industries included plastics, machine shops, fabricated metal, commercial bakeries, and pallet makers.

ROOT CAUSES AND CONTROLS · 29 CFR 1910.147

Why companies really get cited

Not “worker carelessness.” These are the system and leadership failures that make the citation predictable.

- Procedures are generic (“turn off and lock out”) and do not name the energy sources, isolation points, or how to verify zero energy on that machine.
- Production pressure makes clearing a jam with the machine running the normal way. Supervisors know it happens and the line keeps its rate.
- Not enough locks, or locks stored far from the work.
- Annual periodic inspections belong to nobody, or are done on paper without watching the procedure performed.
- New equipment arrives without procedures. Equipment changes never trigger an update.

Controls, in hierarchy order

Eliminate	Design out the need to reach in: jam-resistant feeds, remote clearing tools, lubrication and adjustment points moved outside guards.
Engineer	Lockable disconnects at the point of use, group lock boxes, bleed valves, energy isolation panels, interlocks that support (not replace) LOTO.
Administrative	Machine-specific procedures with photos, labeled isolation points, annual periodic inspection with a named owner, LOTO in the new-equipment checklist, production targets that include downtime for clearing.
PPE	Personal locks and tags. Electrical PPE when testing for absence of voltage.

Systems over blame. If the control only works when a worker is willing to argue with the schedule, it is not a control. Build the condition so the safe way is the normal way, and so stopping the job costs nobody anything.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

03 · CONTROL OF HAZARDOUS ENERGY (LOCKOUT/TAGOUT)

29 CFR 1910.147

SITE	AREA / JOB / CREW	AUDITOR	DATE / SHIFT
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Every machine in this area has a written, machine-specific procedure naming each energy source and isolation point	☐	☐	☐	
2	Isolation points on the machine are labeled to match the procedure	☐	☐	☐	
3	Locks, tags, and hasps are at the point of use, individually keyed and assigned	☐	☐	☐	
4	Watch one lockout: shut down, isolate, lock, release stored energy, verify zero energy (try start), in that order	☐	☐	☐	
5	Each procedure had a periodic inspection in the last 12 months, observed by an authorized employee and certified	☐	☐	☐	
6	Authorized employees can explain the procedure for the machine they work on	☐	☐	☐	
7	Affected employees (operators) can say what a lock means and that they never remove one	☐	☐	☐	
8	Jam clearing and minor servicing have a defined method (LOTO, or a documented alternative that meets the exception)	☐	☐	☐	
9	Group lockout and shift-change lockout have a written method	☐	☐	☐	
10	Contractor LOTO procedures were exchanged and coordinated	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any "No" that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision, made by a named person after the control is in place.

PREVENTION PLAYBOOK · 29 CFR 1910.147

Who owns it

Plant manager	Rate and downtime targets that allow lockout. Funds isolation hardware.
Maintenance manager	Machine-specific procedures, updated when equipment changes.
Supervisor	No reach-ins on running equipment. Locks at the point of use.
Authorized employees	Perform and peer-check lockouts. Conduct periodic inspections.
Safety lead	Program, training, audit of periodic inspections.

How to verify it is working in the field

- Watch an actual lockout once a month per area, not a demonstration.
- Count jams or interventions per shift and how many involved a lock. The gap between those two numbers is your real procedure.
- Audit that periodic inspections were observed, not just signed.

TOOLBOX TALK STARTER

“On this machine, name every source of energy that could move, shock, burn, or crush you. Which one are we most likely to miss?”

Industry notes

Manufacturing	The core audience. Jam clearing, changeovers, and sanitation are the high-risk moments.
Food and bakery	Sanitation crews working on equipment at night are a frequent gap. Commercial bakeries were on the FY 2025 list.
Utilities	Electric power generation, transmission, and distribution work follows 1910.269(d) and (m). Electrical work also involves 1910.333.
Construction	1910.147 does not apply to construction work. Construction energy control is addressed under 1926.417 and Subpart K for electrical, and through equipment-specific rules.
Healthcare and facilities	Boilers, chillers, laundry, kitchen, and other equipment serviced by facilities staff.

IF YOU FIND A GAP

Keep any machine without a usable procedure from being serviced until one is written and verified on that machine. Then ask what production expectation made reaching in normal. Fix the expectation. Then run the eight-step gap response on page 5.

04

SCAFFOLDING - GENERAL REQUIREMENTS

29 CFR 1926.451 · CON

1,725 violations, FY 2026 preliminary · 2,286 FY 2025 final (No. 6)

THE PAIN POINT Who looked at that scaffold this morning before your crew climbed it, and would they put their name on it?

What it requires, in plain words

Scaffolds must be designed, built, and loaded so each scaffold and component can carry its own weight and at least four times the maximum intended load. Platforms must be fully planked. Supported scaffolds must sit on base plates and mud sills or another firm foundation. Workers need proper access when the platform is more than 2 feet above or below the access point, and cross braces are not access. Workers more than 10 feet above a lower level must be protected from falling.

A competent person must inspect scaffolds before each work shift and after any event that could affect structural integrity. Scaffold training is in 1926.454. Scaffolds used in general industry must meet the construction rules (1910.27(a)).

The paragraphs OSHA actually cites FY 2025 data*

PARAGRAPH	WHAT WAS MISSING	CITES
1926.451(g)(1)	No fall protection for workers more than 10 ft above a lower level	583
1926.451(c)(2)	Legs, poles, frames not on base plates and mud sills or other firm foundation	224
1926.451(e)(1)	No proper access when platforms are more than 2 ft above or below access	196
1926.451(b)(1)	Platforms not fully planked or decked	190
1926.451(g)(4)	Guardrail systems not meeting requirements	104

*Top 5 paragraphs, OSHA data Oct. 1, 2024 to Aug. 12, 2025, via Safety+Health. Descriptions paraphrased. FY 2026 paragraph data not yet released.

What OSHA saw this year. Scaffolding climbed from sixth to fourth in FY 2026. OSHA found missing or inadequate guardrails, scaffolds not fully decked, and inadequate foundations or supports across masonry, framing, siding, roofing, and residential and commercial construction.

ROOT CAUSES AND CONTROLS · 29 CFR 1926.451

Why companies really get cited

Not “worker carelessness.” These are the system and leadership failures that make the citation predictable.

- The scaffold is built by whoever is available, not a trained erector, then modified by every trade that uses it.
- The competent person exists on paper but is not on site, or inspects from the ground at a glance.
- Planks and guardrail parts get borrowed to finish another section.
- Access is an afterthought, so people climb frames and braces.
- Ground conditions change (rain, backfill, frost) and nobody re-checks the footing.

Controls, in hierarchy order

Eliminate	Can the work be done from the ground, from a finished floor, or prefabricated?
Substitute	Mast climbers, aerial lifts, or system scaffold with integral guardrails and stairs, instead of ad hoc builds.
Engineer	Full guardrails and toeboards, integral access, engineered ties and foundations, netting or screens for falling objects.
Administrative	Trained erectors only. Competent person inspection each shift. Green/red tag system. No modification without the competent person. Load limits posted.
PPE	Personal fall arrest where guardrails are not feasible (such as erection and dismantling), hard hats for falling objects.

Systems over blame. If the control only works when a worker is willing to argue with the schedule, it is not a control. Build the condition so the safe way is the normal way, and so stopping the job costs nobody anything.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

04 · SCAFFOLDING - GENERAL REQUIREMENTS

29 CFR 1926.451

SITE	AREA / JOB / CREW	AUDITOR	DATE / SHIFT
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	A competent person inspected this scaffold before this shift; the tag or log shows name and date	☐	☐	☐	
2	Base plates and mud sills (or firm foundation) under every leg. No blocks, bricks, or buckets	☐	☐	☐	
3	Platforms fully planked between uprights and guardrail supports; planks secured or properly overlapped	☐	☐	☐	
4	Guardrails (top rail, midrail) on open sides above 10 ft; toeboards where objects could fall	☐	☐	☐	
5	Proper access: stair tower, built-in or attached ladder. Nobody climbing cross braces	☐	☐	☐	
6	Scaffold plumb, braced, and tied to the structure as the design or manufacturer requires	☐	☐	☐	
7	Platform load within rating. No material piles	☐	☐	☐	
8	Users and erectors have documented scaffold training (1926.454)	☐	☐	☐	
9	Clearance from power lines meets 1926.451(f)(6)	☐	☐	☐	
10	An unsafe-scaffold tag process exists and workers know it	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any "No" that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision, made by a named person after the control is in place.

PREVENTION PLAYBOOK · 29 CFR 1926.451

Who owns it

Project manager	Scaffold scope, budget, and a qualified erector in the plan.
Competent person	Pre-shift inspection, tags, authority to close the scaffold.
Trade foremen	No modifications. Report damage.
Workers	Check the tag before climbing. Report missing parts.

How to verify it is working in the field

- Ask the competent person to show you today's inspection and walk the scaffold with you.
- Climb the access and look at planking and guardrails on the top level.
- Count red-tag days. A scaffold that is never red-tagged is probably not being inspected honestly.

TOOLBOX TALK STARTER

“Before you climbed today, what did you check, and what would make you get off this scaffold?”

Industry notes

Construction	Masonry, framing, siding, and roofing led FY 2025.
Manufacturing, utilities, healthcare	Scaffolds for shutdowns and outages follow 1926 Subpart L through 1910.27(a). Contractor-built scaffolds in your facility are still in your conditions.
Warehousing and facilities	Rolling and baker-style scaffolds for overhead work need locked casters and guardrails where required.

IF YOU FIND A GAP

Red-tag the scaffold and clear it until a competent person corrects and re-inspects it. Then ask who built it, who changed it, and why the pre-shift inspection did not catch it. Then run the eight-step gap response on page 5.

05

LADDERS

29 CFR 1926.1053 · CON

1,659 violations, FY 2026 preliminary · 2,842 FY 2025 final (No. 3)

THE PAIN POINT The most-cited ladder paragraph is a ladder that does not reach 3 feet past the landing. Why is the right ladder not on the job?

What it requires, in plain words

Construction ladders must be the right type and length, set up correctly, kept in good condition, and used only for their designed purpose. Portable ladders used to reach an upper level must extend at least 3 feet above the landing, or be secured at the top with a grab rail when that is not possible. Workers must not stand on the top or top step of a stepladder or carry loads that could make them lose balance. Defective ladders must be marked and removed from service. Ladder training is in 1926.1060.

General industry ladders are covered separately by 1910.23.

The paragraphs OSHA actually cites FY 2025 data*

PARAGRAPH	WHAT WAS MISSING	CITES
1926.1053(b)(1)	Side rails not extended 3 ft above the upper landing (or secured with grab rail)	1,632
1926.1053(b)(4)	Ladders used for purposes they were not designed for	189
1926.1053(b)(13)	Top or top step of a stepladder used as a step	173
1926.1053(b)(16)	Defective ladders not marked and withdrawn from service	80
1926.1053(b)(22)	Carrying objects or loads that could cause loss of balance	69

*Top 5 paragraphs, OSHA data Oct. 1, 2024 to Aug. 12, 2025, via Safety+Health. Descriptions paraphrased. FY 2026 paragraph data not yet released.

What OSHA saw this year. FY 2026 violations included ladders not extending 3 feet above landings, ladders used for purposes they were not designed for, defective ladders, and workers on top steps. Roofing, framing, and siding contractors were among those cited.

ROOT CAUSES AND CONTROLS · 29 CFR 1926.1053

Why companies really get cited

Not “worker carelessness.” These are the system and leadership failures that make the citation predictable.

- Crews get whatever ladder is on the truck. Nobody matched ladders to the heights on this job.
- Damaged ladders stay in service because there is no replacement budget, or nobody is allowed to throw one away.
- A ladder is the default for any work at height because nobody planned a lift or platform.
- Training is assumed. Most ladder use is learned by watching the last person.

Controls, in hierarchy order

Eliminate	Plan the work so ladders are not needed: stairs, finished floors, pre-assembly.
Substitute	Mobile elevating work platforms, podium or platform ladders, rolling stairs, scissor lifts.
Engineer	Levelers, standoffs, ladder ties and stops at the top, grab rails at the landing.
Administrative	Ladder list per job matched to heights, pre-use inspection, replacement budget, ladder training.
PPE	Personal fall protection where a fixed ladder or task requires it. Most ladder risk is managed by selection and setup, not gear.

Systems over blame. If the control only works when a worker is willing to argue with the schedule, it is not a control. Build the condition so the safe way is the normal way, and so stopping the job costs nobody anything.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

05 · LADDERS

29 CFR 1926.1053

SITE	AREA / JOB / CREW	AUDITOR	DATE / SHIFT
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Every extension ladder used for access reaches 3 ft above the landing or is secured with a grab rail	☐	☐	☐	
2	Extension ladders set at about 1:4 (1 ft out for every 4 ft up) and secured against movement	☐	☐	☐	
3	No one on the top cap or top step of a stepladder	☐	☐	☐	
4	Stepladders fully opened and locked, not leaned against a wall as a straight ladder	☐	☐	☐	
5	No cracked rails, missing rungs, bent feet, or missing labels; damaged ladders tagged "Do Not Use" and removed	☐	☐	☐	
6	Duty rating covers the worker plus tools and materials	☐	☐	☐	
7	Non-conductive (fiberglass) ladders where electrical contact is possible	☐	☐	☐	
8	Materials hoisted or carried another way, not by hand up the ladder	☐	☐	☐	
9	Ladder training documented, by a competent person (1926.1060)	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any "No" that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision, made by a named person after the control is in place.

Who owns it

Owner / project manager	Budget for the right ladders and lifts. Replace damaged ladders without argument.
Foreman	Matches ladders to the job. Pulls damaged ones.
Workers	Pre-use inspection. Three points of contact. Stop if the ladder is wrong.

How to verify it is working in the field

- Walk the site with a tape measure. Check every access ladder for the 3 ft extension.
- Look for tagged ladders in the rack. If none are ever tagged, nobody is inspecting.
- Ask: "If this ladder were damaged, who would you tell, and what would happen to it?"

TOOLBOX TALK STARTER

"What are we using a ladder for on this job that we should be using a lift or a platform for?"

Industry notes

Construction	1926.1053 applies. Roofing, framing, siding, single-family builders, and remodelers led FY 2025.
Retail, warehousing, healthcare, manufacturing	General industry ladders are 1910.23, with fixed-ladder fall protection phased in under 1910.28(b)(9). Rolling stairs and step stools are common.
Utilities	Non-conductive ladders near energized parts. Ladder work in power line settings is also governed by 1910.269.

IF YOU FIND A GAP

Remove the wrong or damaged ladder now and hold the task until the right equipment is on site. Then look at how ladders are bought, assigned, and replaced. Then run the eight-step gap response on page 5.

06

RESPIRATORY PROTECTION

29 CFR 1910.134 · BOTH

1,608 violations, FY 2026 preliminary · 2,294 FY 2025 final (No. 5)

THE PAIN POINT If someone on your crew wears a respirator, has a medical provider cleared them to wear it, and does it actually seal on their face?

What it requires, in plain words

When respirators are needed to protect workers, or when the employer requires them, the employer must run a written respiratory protection program with worksite-specific procedures and a qualified program administrator. That means choosing the right respirator for the hazard, a medical evaluation before fit testing or use, fit testing before first use and at least annually for tight-fitting respirators, training at least annually, and proper cleaning, storage, and maintenance.

Voluntary use is different. If workers choose to wear a filtering facepiece (dust mask), the employer must give them the information in Appendix D. For voluntary use of other respirators, the employer must also make sure the user is medically able and the respirator is kept clean.

The paragraphs OSHA actually cites FY 2025 data*

PARAGRAPH	WHAT WAS MISSING	CITES
1910.134(e)(1)	No medical evaluation before fit testing or use	403
1910.134(c)(1)	No written, worksite-specific respiratory protection program	288
1910.134(f)(2)	Tight-fitting users not fit tested before use, on facepiece change, and annually	251
1910.134(c)(2)	Voluntary-use requirements not met	177
1910.134(k)	Training and information not provided	122

*Top 5 paragraphs, OSHA data Oct. 1, 2024 to Aug. 12, 2025, via Safety+Health. Descriptions paraphrased. FY 2026 paragraph data not yet released.

What OSHA saw this year. FY 2026 problems: missing medical evaluations, fit testing, and training, plus respirators that did not match the hazard. Masonry contractors, auto body shops, and machine shops were among those cited.

ROOT CAUSES AND CONTROLS · 29 CFR 1910.134

Why companies really get cited

Not “worker carelessness.” These are the system and leadership failures that make the citation predictable.

- Respirators were handed out as a quick fix without an exposure assessment, so nobody knows whether the cartridge is right.
- Medical evaluations and fit tests cost money and time. They get deferred until an inspection or an injury.
- Nobody is named program administrator, so annual fit tests and training lapse.
- Engineering controls (wet methods, ventilation) were never considered because a mask was cheaper today.

Controls, in hierarchy order

Eliminate	Remove the airborne hazard: change the process, buy pre-cut or pre-finished materials.
Substitute	Lower-toxicity products, lower-dust materials.
Engineer	Wet cutting, local exhaust ventilation, filtered enclosed cabs, vacuum dust collection (for construction silica, see Table 1 of 1926.1153).
Administrative	Exposure assessment, regulated areas, limiting time and number of people exposed, written program and administrator.
PPE	Respirators chosen for the hazard and concentration, with medical clearance, fit test, and training. The respirator is the last layer, not the plan.

Systems over blame. If the control only works when a worker is willing to argue with the schedule, it is not a control. Build the condition so the safe way is the normal way, and so stopping the job costs nobody anything.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

06 · RESPIRATORY PROTECTION

29 CFR 1910.134

SITE	AREA / JOB / CREW	AUDITOR	DATE / SHIFT
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	An exposure assessment exists for each task where respirators are used (sampling or objective data)	☐	☐	☐	
2	The written program names a program administrator and covers selection, medical, fit testing, training, and maintenance	☐	☐	☐	
3	Every required user has a medical clearance on file dated before their fit test	☐	☐	☐	
4	Fit test within the last 12 months for the exact make, model, style, and size each person wears	☐	☐	☐	
5	Cartridge or filter matches the hazard; gas and vapor cartridges have a change schedule	☐	☐	☐	
6	No facial hair where the seal meets the face on tight-fitting respirators	☐	☐	☐	
7	Respirators cleaned and stored protected from dust and damage	☐	☐	☐	
8	Voluntary dust-mask users received Appendix D	☐	☐	☐	
9	Users can show a seal check and explain when to change cartridges	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any "No" that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision, made by a named person after the control is in place.

PREVENTION PLAYBOOK · 29 CFR 1910.134

Who owns it

Executive	Funds engineering controls first and the respirator program second.
Program administrator	One named, qualified person. Selection, medical, fit testing, training, records.
Supervisor	Right respirator on the right task. Pulls anyone not cleared or fit tested.
Workers	Seal check every time. Report fit or breathing problems.

How to verify it is working in the field

- Pick five people wearing respirators today and match them to medical and fit test records.
- Ask a user what their cartridge protects against. They should know.
- Check whether the engineering control (water, vacuum, ventilation) is actually running at the task.

TOOLBOX TALK STARTER

“What is in the air on this task that we cannot see, and what is our first line of defense before the mask?”

Industry notes

Construction and stone	Respirable crystalline silica (1926.1153 construction, 1910.1053 general industry) drives many respirator programs. Cut stone and masonry led FY 2025.
Auto body and coatings	Isocyanate paints need engineering controls and properly selected respirators, often supplied air.
Healthcare	Fit-tested N95s and other respirators for airborne infectious disease and some hazardous drug tasks. Annual fit testing still applies.
Manufacturing and machine shops	Welding fume, metalworking fluid mist, and solvents.

IF YOU FIND A GAP

Pull anyone without medical clearance or a current fit test from tasks that require a respirator until they are cleared and tested. Then ask why the program administrator role was empty or unfunded. Then run the eight-step gap response on page 5.

07

POWERED INDUSTRIAL TRUCKS

29 CFR 1910.178 · GI

1,379 violations, FY 2026 preliminary · 2,150 FY 2025 final (No. 8)

THE PAIN POINT Who drove a forklift in your building last week who has never been evaluated on that truck, in that building?

What it requires, in plain words

Forklifts and other powered industrial trucks must be designed, maintained, and operated safely. Only trained and evaluated operators may drive. Training includes formal instruction, practical training, and an evaluation of the operator's performance in the workplace. The employer must certify training and evaluation in writing, give refresher training when needed, and evaluate each operator at least once every three years. Trucks must be examined before being placed in service (daily, or after each shift when used around the clock) and taken out of service when unsafe.

Refresher training is required after unsafe operation, an accident or near miss, a poor evaluation, assignment to a different type of truck, or a change in workplace conditions.

The paragraphs OSHA actually cites FY 2025 data*

PARAGRAPH	WHAT WAS MISSING	CITES
1910.178(l)(1)	Operator not shown competent to operate safely (training and evaluation)	413
1910.178(l)(4)	No refresher training and evaluation when required	223
1910.178(l)(6)	No certification of operator training and evaluation	223
1910.178(l)(2)	Training program not properly implemented	134
1910.178(p)(1)	Truck needing repair or unsafe not taken out of service	120

*Top 5 paragraphs, OSHA data Oct. 1, 2024 to Aug. 12, 2025, via Safety+Health. Descriptions paraphrased. FY 2026 paragraph data not yet released.

What OSHA saw this year. FY 2026 recurring issues were training and evaluation, missing refresher training, defective equipment, and missed daily or shift inspections. Warehousing, framing contractors, and machine shops were among the industries cited.

ROOT CAUSES AND CONTROLS · 29 CFR 1910.178

Why companies really get cited

Not “worker carelessness.” These are the system and leadership failures that make the citation predictable.

- Training was a video and a quiz. Nobody watched the operator drive in this building on this truck.
- Temporary and borrowed workers drive without anyone checking that their training applies here.
- Daily checklists get pencil-whipped because a defect means no truck and the shipment is due.
- Pedestrians and trucks share aisles because the layout was never designed for traffic separation.
- Near misses are not reported because reporting one takes your truck away.

Controls, in hierarchy order

Eliminate	Redesign flow so fewer truck moves are needed. Conveyors or automated vehicles with proper safeguards.
Engineer	Physical barriers between people and trucks, zone lights, speed limiters, proximity warning, dock locks, mirrors at blind corners.
Administrative	Site-specific practical evaluation, refresher triggers enforced, key control, pre-use exam where a defect means truck out and no blame, written traffic plan.
PPE	High-visibility clothing for pedestrians. Operator restraints on trucks.

Systems over blame. If the control only works when a worker is willing to argue with the schedule, it is not a control. Build the condition so the safe way is the normal way, and so stopping the job costs nobody anything.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

07 · POWERED INDUSTRIAL TRUCKS

29 CFR 1910.178

SITE	AREA / JOB / CREW	AUDITOR	DATE / SHIFT
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Every operator on the floor today has a certification naming them, the training and evaluation dates, and the evaluator	☐	☐	☐	
2	Evaluations are under 3 years old and were done on the type of truck being driven	☐	☐	☐	
3	Refresher training documented after any incident, near miss, or observed unsafe operation	☐	☐	☐	
4	Today's pre-use examination done for each truck, with defects actually written down	☐	☐	☐	
5	Defective trucks tagged out and parked, keys controlled	☐	☐	☐	
6	Pedestrian walkways marked and separated from truck routes where possible	☐	☐	☐	
7	Seat belts or operator restraints used on sit-down trucks	☐	☐	☐	
8	Loads stable and within rated capacity; forks lowered when parked	☐	☐	☐	
9	Charging and refueling areas ventilated; eyewash where batteries are serviced	☐	☐	☐	
10	Temporary and staffing-agency operators evaluated at your site before driving	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any "No" that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision, made by a named person after the control is in place.

PREVENTION PLAYBOOK · 29 CFR 1910.178

Who owns it

Operations manager	Traffic layout. Enough trucks that a defective one can come out of service.
Supervisor	Only certified operators drive. Key control. Reviews daily checks.
Trainer / evaluator	Site-specific practical evaluations.
Staffing agency and host	Shared responsibility for temps. The host evaluates on site.
Operators	Honest pre-use exam. Report near misses.

How to verify it is working in the field

- Stand at the busiest intersection for 15 minutes and count pedestrian-truck conflicts.
- Pull three daily checklists from last week. If none show a defect in a month, they are not real.
- Match the names of everyone who drove today to the certification list.

TOOLBOX TALK STARTER

“Where in this building is a forklift and a person most likely to end up in the same spot at the same time?”

Industry notes

Warehousing and distribution	General warehousing led the FY 2025 forklift list. Pedestrian traffic and dock edges are the big exposures.
Construction	Rough-terrain forklifts fall under 1926.602(d), which points back to the 1910.178(l) training rules.
Manufacturing	Mixed traffic in production areas and tight aisles.
Young workers	Federal child labor rules (FLSA Hazardous Occupations Order No. 7) generally prohibit workers under 18 from operating forklifts.

IF YOU FIND A GAP

Take the keys from anyone not evaluated and certified, and tag out any defective truck. Then ask why the schedule depended on an uncertified operator or a broken truck. Then run the eight-step gap response on page 5.

08

FALL PROTECTION - TRAINING REQUIREMENTS

29 CFR 1926.503 · CON

1,273 violations, FY 2026 preliminary · 2,216 FY 2025 final (No. 7)

THE PAIN POINT Your newest hire went up on the roof Monday. When were they trained, by whom, and can they show you how to inspect their harness?

What it requires, in plain words

Every construction worker who might be exposed to fall hazards must be trained by a competent person to recognize fall hazards and to use the protection systems on the job. The employer must keep a written certification with the worker's name, training dates, and the trainer's or employer's signature. Workers must be retrained when the workplace changes, the fall protection systems change, or they show they do not understand or use protection correctly.

General industry fall protection training is in 1910.30(a).

The paragraphs OSHA actually cites FY 2025 data*

PARAGRAPH	WHAT WAS MISSING	CITES
1926.503(a)(1)	No training program for each employee exposed to fall hazards	1,216
1926.503(b)(1)	No written certification record of training	491
1926.503(a)(2)	Training not provided by a competent person	97
1926.503(c)(3)	No retraining after inadequate knowledge or use was shown	90
1926.503(c)	Retraining requirements generally	11

*Top 5 paragraphs, OSHA data Oct. 1, 2024 to Aug. 12, 2025, via Safety+Health. Descriptions paraphrased. FY 2026 paragraph data not yet released.

What OSHA saw this year. FY 2026 problems included workers with no training, new workers starting before they were trained, missing training elements, and no certification. Cline said construction's fragmented structure, with crews and subcontractors moving through jobsites, makes oversight hard.

ROOT CAUSES AND CONTROLS · 29 CFR 1926.503

Why companies really get cited

Not “worker carelessness.” These are the system and leadership failures that make the citation predictable.

- New hires start the day they are hired because the crew is short. Training is “this week sometime.”
- Training is a classroom session with no hands-on part, so workers cannot inspect or don a harness correctly.
- Subcontractors assume their crews are trained. Nobody asks for records.
- Retraining never happens because nobody watches for the signs that someone does not understand.

Controls, in hierarchy order

Eliminate / engineer first	Training does not remove the hazard. Passive systems (guardrails, covers) reduce how much depends on training. Do that first.
Administrative	Training before first exposure as a hiring step, competent person trainers, hands-on demonstration, certification records, retraining triggers, subcontractor record checks.
Verify	Field observation of each new worker's equipment use in their first week.

Systems over blame. If the control only works when a worker is willing to argue with the schedule, it is not a control. Build the condition so the safe way is the normal way, and so stopping the job costs nobody anything.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

08 · FALL PROTECTION - TRAINING REQUIREMENTS

29 CFR 1926.503

SITE	AREA / JOB / CREW	AUDITOR	DATE / SHIFT
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Every worker exposed to falls on this job has a signed certification (name, date, trainer or employer signature)	☐	☐	☐	
2	Training was by a competent person and covered hazards, system use, inspection, and rescue	☐	☐	☐	
3	New hires and transfers were trained before their first exposure	☐	☐	☐	
4	Ask 2 workers to inspect and put on a harness and explain how they would anchor on this job	☐	☐	☐	
5	Subcontractor training records were requested and reviewed	☐	☐	☐	
6	Retraining records exist after system changes, new hazards, or observed mistakes	☐	☐	☐	
7	Training covers the specific systems used on this site (guardrails, PFAS, warning lines, monitors)	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision, made by a named person after the control is in place.

PREVENTION PLAYBOOK · 29 CFR 1926.503

Who owns it

Owner / HR	Onboarding that puts fall training before first exposure.
Competent person trainer	Delivers and certifies hands-on training.
Superintendent	Collects subcontractor training records.
Foreman	Watches for retraining signs and acts on them.

How to verify it is working in the field

- Compare today's crew list to the training certifications. Every name should match.
- Observe new workers on their first elevated task.
- Ask: "Who trained you on fall protection, and what did they make you show them?"

TOOLBOX TALK STARTER

"If a new person joined this crew this morning, what would we have to teach them before they go up?"

Industry notes

Construction	Roofing, framing, siding, and residential and commercial building led FY 2025.
General industry	1910.30(a) requires fall hazard training by a qualified person for workers who use personal fall protection and certain other systems.
Utilities	Climbing and fall protection training also falls under 1910.269 training requirements.

IF YOU FIND A GAP

Keep untrained workers off elevated work until a competent person trains them and the certification is signed. Then fix onboarding so training happens before the first shift at height, not after. Then run the eight-step gap response on page 5.

09

EYE AND FACE PROTECTION

29 CFR 1926.102 · CON

1,120 violations, FY 2026 preliminary · 1,965 FY 2025 final (No. 9)

THE PAIN POINT Eye protection is the cheapest PPE on site and still one of the most cited. What does that tell you about supervision?

What it requires, in plain words

In construction, the employer must make sure each worker exposed to eye or face hazards (flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or harmful light radiation) uses appropriate eye or face protection. It must give side protection where there is a flying object hazard, must work with prescription lenses, and must meet ANSI Z87.1 (2010, 2003, or 1989 R1998 editions).

General industry is covered by 1910.133. The employer generally pays for required PPE, with narrow exceptions (1926.95(d), 1910.132(h)).

The paragraphs OSHA actually cites FY 2025 data*

PARAGRAPH	WHAT WAS MISSING	CITES
1926.102(a)(1)	Appropriate eye or face protection not used where hazards exist	1,648
1926.102(a)(2)	No side protection where there is a flying object hazard	8
1926.102(b)(1)	Protection not meeting the listed ANSI Z87.1 editions	7
1926.102(a)(3)	Prescription lens wearers not given compatible protection	1
1926.102(a)(5)	Protectors not meeting minimum requirements	1

*Top 5 paragraphs, OSHA data Oct. 1, 2024 to Aug. 12, 2025, via Safety+Health. Descriptions paraphrased. FY 2026 paragraph data not yet released.

What OSHA saw this year. FY 2026: workers without eye and face protection, without side protection, or wearing eyewear that did not meet specifications. Especially common among framing, roofing, siding, and masonry contractors and in residential construction and renovation.

Why companies really get cited

Not “worker carelessness.” These are the system and leadership failures that make the citation predictable.

- Nobody did a hazard assessment, so the requirement is a vague “wear your glasses.”
- Safety glasses fog, scratch, or do not fit, so people take them off. Nobody buys better ones.
- Supervisors do not wear them either. The crew reads the supervisor, not the poster.
- Nail guns and saws are treated as background noise, not as projectile hazards.

Controls, in hierarchy order

Eliminate / engineer	Guards on tools, shields and screens around grinding and cutting, enclosed processes, welding curtains.
Administrative	Hazard assessment by task, eye protection zones, supervisors wear it every time, comfortable options stocked at the point of use.
PPE	Z87+ safety glasses with side protection, goggles for dust and splash, face shields as a second layer, correct welding shades.

Systems over blame. If the control only works when a worker is willing to argue with the schedule, it is not a control. Build the condition so the safe way is the normal way, and so stopping the job costs nobody anything.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

09 · EYE AND FACE PROTECTION

29 CFR 1926.102

SITE	AREA / JOB / CREW	AUDITOR	DATE / SHIFT
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	A PPE hazard assessment for this job lists eye and face hazards by task	☐	☐	☐	
2	Everyone exposed is wearing eye protection right now, including supervisors and visitors	☐	☐	☐	
3	Eyewear is marked Z87 (Z87+ for impact) and has side protection	☐	☐	☐	
4	Face shields worn over safety glasses for grinding, chipping, or chemical splash	☐	☐	☐	
5	Anti-fog, tinted, and over-the-glasses options stocked and free	☐	☐	☐	
6	Prescription wearers have prescription safety eyewear or approved over-glasses	☐	☐	☐	
7	Welding and cutting filter shades match the process	☐	☐	☐	
8	Eyewash available where corrosive chemicals are used	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision, made by a named person after the control is in place.

PREVENTION PLAYBOOK · 29 CFR 1926.102

Who owns it

Owner	Buys eyewear people will actually wear. Leaders wear it.
Foreman	Hazard assessment by task. Corrects in the moment.
Safety lead	Selection, stock, assessment template.
Workers	Wear it. Report what does not fit.

How to verify it is working in the field

- Count compliance at the start, middle, and end of the shift. The end of the shift is usually the real number.
- Ask what makes people take their glasses off. Fix that.
- Check that supervisors are wearing it before you check anyone else.

TOOLBOX TALK STARTER

“What on this job today could throw something at your eyes, and what makes people take their glasses off?”

Industry notes

Construction	1926.102 applies. Framing, roofing, siding, and masonry led.
General industry, manufacturing, warehousing	1910.133 applies, with a written, certified hazard assessment under 1910.132(d).
Healthcare	Splash protection for blood and body fluids under the Bloodborne Pathogens standard, 1910.1030(d)(3)(x).
Utilities	Arc-rated face protection where arc flash exposure exists, under 1910.269(l).

IF YOU FIND A GAP

Stop the task until the worker has proper eye protection. Then ask why it was not worn: supply, fit, comfort, or a supervisor who does not wear it. Fix the reason. Then run the eight-step gap response on page 5.

10

MACHINE GUARDING - GENERAL REQUIREMENTS

29 CFR 1910.212 · GI

1,072 violations, FY 2026 preliminary · 1,498 FY 2025 final (No. 10)

THE PAIN POINT Walk your floor and look for the guard that is zip-tied open, leaning against the wall, or sitting in a drawer. Who decided that was okay?

What it requires, in plain words

Employers must guard machines to protect the operator and others in the area from hazards such as the point of operation, ingoing nip points, rotating parts, and flying chips and sparks. Guards must be attached to the machine where possible and must not create a hazard themselves. Point of operation guarding must keep any part of the body out of the danger zone during operation. Machines designed for a fixed location must be anchored. Fan blades less than 7 feet above the floor must be guarded, with openings no larger than half an inch.

Some machines have their own standards: woodworking (1910.213), abrasive wheels (1910.215), mechanical power presses (1910.217), and power transmission apparatus (1910.219).

The paragraphs OSHA actually cites FY 2025 data*

PARAGRAPH	WHAT WAS MISSING	CITES
1910.212(a)(1)	No guarding method protecting the operator and others from machine hazards	858
1910.212(a)(3)	Point of operation not guarded	284
1910.212(a)(2)	Guards not affixed, or guards that create their own hazard	41
1910.212(b)	Fixed machinery not anchored	38
1910.212(a)(5)	Fan blades under 7 ft not guarded	9

*Top 5 paragraphs, OSHA data Oct. 1, 2024 to Aug. 12, 2025, via Safety+Health. Descriptions paraphrased. FY 2026 paragraph data not yet released.

What OSHA saw this year. Machine Guarding held No. 10 in FY 2026 with 1,072 violations. FY 2025 industries included machine shops, fabricated metal, plastics, structural metal, and sheet metal.

ROOT CAUSES AND CONTROLS · 29 CFR 1910.212

Why companies really get cited

Not “worker carelessness.” These are the system and leadership failures that make the citation predictable.

- Guards slow the job or make adjustments hard, so they come off, and production rates get set without them.
- Used or older machines arrive without guards, and guarding was never in the purchase budget.
- Maintenance removes guards for repair and nobody checks they went back on before restart.
- Guarding is treated as an operator rule instead of an equipment standard owned by engineering and maintenance.

Controls, in hierarchy order

Eliminate	Automate loading and unloading so hands never go near the point of operation.
Engineer	Fixed guards first, then interlocked guards, presence-sensing devices, two-hand controls, self-adjusting guards. Design guards so adjustment and lubrication can happen without removal.
Administrative	Pre-shift guard check, guarding review in purchasing and management of change, restart verification after maintenance, production rates set with guards in place.
PPE	Eye protection for chips and sparks. Gloves can be a hazard near rotating parts; never use PPE as a guard substitute.

Systems over blame. If the control only works when a worker is willing to argue with the schedule, it is not a control. Build the condition so the safe way is the normal way, and so stopping the job costs nobody anything.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

10 · MACHINE GUARDING - GENERAL REQUIREMENTS

29 CFR 1910.212

SITE	AREA / JOB / CREW	AUDITOR	DATE / SHIFT
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Every point of operation in this area is guarded so hands cannot reach the danger zone during operation	☐	☐	☐	
2	Belts, pulleys, chains, sprockets, gears, shafts, and couplings fully guarded	☐	☐	☐	
3	Guards attached and not removable without a tool, or interlocked	☐	☐	☐	
4	No guards bypassed, zip-tied, removed, or modified	☐	☐	☐	
5	Interlocks and light curtains tested this shift and working	☐	☐	☐	
6	Fixed machines anchored; no walking or rocking	☐	☐	☐	
7	Fans under 7 ft have guards with openings no larger than 1/2 inch	☐	☐	☐	
8	Restart after maintenance includes a guard check (part of the LOTO release step)	☐	☐	☐	
9	Operators can say what to do if a guard is missing or damaged	☐	☐	☐	
10	Purchasing of new and used equipment includes a guarding review before it runs	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision, made by a named person after the control is in place.

PREVENTION PLAYBOOK · 29 CFR 1910.212

Who owns it

Plant manager	Rates set with guards on. Guarding budgeted on every machine purchase.
Engineering / maintenance	Design, install, and maintain guards. Guards back on before restart.
Supervisor	Pre-shift check. Machine down if a guard is missing.
Operators	Report missing or bypassed guards. Never run without one.

How to verify it is working in the field

- Walk each machine asking one question: can I reach the hazard? Test openings with a pencil or a guard-opening gauge, never your hand.
- Look for bypass evidence: tape, zip ties, jumpers in interlocks, guards stacked in corners.
- Ask operators which guard slows them down the most. Redesign that one before it comes off.

TOOLBOX TALK STARTER

“Which guard on this line gets in the way the most, and what would make it so nobody wants to take it off?”

Industry notes

Manufacturing and machine shops	The core audience. Presses, saws, lathes, conveyors, and packaging equipment.
Construction	Tools and equipment fall under 1926.300 and related sections, not 1910.212.
Food processing	Mixers, slicers, and conveyors, often during sanitation.
Healthcare and facilities	Laundry and kitchen equipment, and mechanical rooms (fans, belts, pumps).

IF YOU FIND A GAP

Take the machine out of service until the guard is restored or a compliant guard is installed. Then find out why running unguarded was possible: rate, design, maintenance restart, or purchasing. Then run the eight-step gap response on page 5.

CHECK OUR WORK

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<https://www.osha.gov/consultation>
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<https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.503>
15. 29 CFR 1910.28, Duty to have fall protection and falling object protection (general industry)
<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.28>
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<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1200>
17. 29 CFR 1910.147, The control of hazardous energy (lockout/tagout)
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Data retrieved and verified October 13, 2026. This guide is a practical summary for planning and self-audit. It is not legal advice and does not replace the text of the standards, OSHA interpretations, or your state plan's rules. State-plan states may have different or additional requirements. Paragraph descriptions are paraphrased. When this guide and a regulation disagree, the regulation controls.

FREE FIELD TOOL · NEXT STEP

TAKE ONE JOB. SEVEN MINUTES.

The free 7-Minute Safety Walk is a one-page field tool. Pick one job running right now, name the energy, find the control you can put your hand on, and compare it to what the paper claims. It is the fastest way to find out whether any of the ten standards in this guide are working on your floor today.

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